

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION**

FOREST RIVER FARMS, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

DEERE & CO. (d/b/a JOHN DEERE),

Defendant.

Case No. 3:22-cv- 50208

Hon. Iain D. Johnston

**DEFENDANT DEERE & COMPANY’S UNOPPOSED MOTION FOR EXTENSION OF  
TIME TO ANSWER OR OTHERWISE PLEAD**

Defendant Deere & Company (“John Deere”), by and through its undersigned attorneys, respectfully moves this Court for an order extending John Deere’s time to answer or otherwise plead until a case management conference or an order by the Court in the consolidated action entitled In re: Deere and Company Repair Services Antitrust Litigation, 3:22-cv-50188 pending in the Northern District of Illinois (Western Division) before the Honorable Iain D. Johnston requires John Deere’s response in this action. In support of this Motion, John Deere states as follows:

1. Plaintiff Forest River Farms (“Plaintiff”) filed its Complaint against John Deere on or about January 12, 2022. (ECF No. 1).

2. On February 25, 2022, John Deere filed with the Judicial Panel on Multidistrict Litigation (“JPML”) a Motion to Transfer for Consolidated Proceedings the then-pending six cases, including this case, for consolidated pretrial proceedings pursuant to 28 U.S.C. § 1407. (ECF No. 19, Exhibit A).

3. On March 21, 2022, the Honorable Martha M. Pacold granted John Deere's motion to stay the case until 30 days after the JPML resolved John Deere's motion to consolidate and transfer the cases against it. (ECF No. 26)

4. Following briefing and oral argument, the JPML ordered the six original actions pending against John Deere, including this action, to be transferred to the Northern District of Illinois (Western Division) before the Honorable Iain D. Johnston for coordinated or consolidated pretrial proceedings.

5. On June 15, 2022, the Court transferred this case to the Northern District of Illinois (Western Division) as No. 22-cv-50208 before the Honorable Iain D. Johnston pursuant to the JPML's order. (ECF Nos. 29-31).

6. Pursuant to the Court's Order on John Deere's Motion to Stay, John Deere's deadline to answer or otherwise plead is due on July 1, 2022. (ECF No. 26).

7. On June 23, 2022, John Deere's counsel communicated with Plaintiff's counsel regarding the relief requested herein. Plaintiff's counsel agreed to extend the time for John Deere to answer or otherwise plead pending a case management conference or order requiring John Deere's response in this action is entered in the consolidated action entitled In re: Deere and Company Repair Services Antitrust Litigation, 3:22-cv-50188 pending in the Northern District of Illinois (Western Division) before the Honorable Iain D. Johnston. Plaintiff's counsel confirmed that Plaintiff does not oppose this motion for extension of time to answer or otherwise plead.

8. John Deere now seeks an order from this Court extending John Deere's time to answer or otherwise plead pending a case management conference or order requiring John Deere's response in this action is entered in the consolidated action entitled In re: Deere and

Company Repair Services Antitrust Litigation, 3:22-cv- 50188 (Northern District of Illinois- Western Division).

9. This is the first request for additional time sought by John Deere following the JPML's decision to consolidate and transfer the cases pending against it.

10. This extension is sought in good faith and not for the purposes of delay. Neither party will be prejudiced by this extension.

WHEREFORE, for the foregoing reasons, Defendant Deere & Company respectfully requests that this Court extend its time to answer or otherwise plead pending a case management conference or order requiring its response in this action is entered in the consolidated action entitled In re: Deere and Company Repair Services Antitrust Litigation, 3:22-cv- 50188 (Northern District of Illinois- Western Division).

Dated: June 27, 2022

Respectfully submitted,

/s/ Amanda B. Maslar

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*\*Pro Hac Vice Application Forthcoming*

*Counsel for Defendant Deere & Company*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was filed using the CM/ECF system, which will effectuate service on all counsel of record.

/s/ Amanda B. Maslar